

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

**DECLARATION OF
TERRENCE J. FLEMING IN
FURTHER SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

Defendants.

I, Terrence J. Fleming, declare as follows:

1. I am an attorney at Fredrikson & Byron, P.A. and am one of the attorneys representing Defendants Federal Insurance Company and ACE American Insurance Company (collectively, “Federal”) in this case.

2. Attached as **Exhibit A** is a letter dated November 15, 2019 from Federal’s counsel to Fair Isaac Corporation’s counsel disclosing the dates and locations of all versions of Blaze Advisor software that were installed outside of the United States.

3. Attached as **Exhibit B** is the Notice of Deposition under Federal Rule of Civil Procedure 30(b)(6) of Federal Insurance Company and ACE American Insurance Company dated November 18, 2019.

4. Attached as **Exhibit C** is the deposition transcript from Federal’s 30(b)(6) deposition related to use and installation of Blaze Advisor software outside of the United States dated November 26, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 22, 2020

s/ Terrence J. Fleming

Terrence J. Fleming